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Attorneys for Plaintiff
VERISIGN, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

VERISIGN, INC., a corporation,

Plaintiff,

vs.

IDN TECHNOLOGIES LLC, a limited
liability company,

Defendant.

) Case No. 05-00099 PJH

) **E-FILING**

) **STIPULATION AND [PROPOSED] ORDER**
) **TO CONTINUE IMPENDING DATES**
) **PENDING THE EXECUTION OF**
) **SETTLEMENT AGREEMENT**

AKIN GUMP STRAUSS HAUER & FELD LLP
2029 CENTURY PARK EAST
SUITE 2400
LOS ANGELES, CA 90067

1 Plaintiff VeriSign, Inc. ("VeriSign") and Defendant IDN Technologies LLC ("IDNT"),
 2 through their respective counsel of record, hereby agree and stipulate to the entry of the
 3 following Stipulation and Proposed Order:

4 WHEREAS, on April 7, 2005, the Court issued an order, scheduling the case
 5 management conference for June 9, 2005, requiring the parties to submit a joint case
 6 management conference statement by June 2, 2005, requiring the parties to engage in a
 7 settlement conference before the Honorable Magistrate Judge Elizabeth D. Laporte "by June 8,
 8 2005 or as soon thereafter as convenient for the judge";

9 WHEREAS, IDNT's answer to VeriSign's complaint is due by June 6, 2005;

10 WHEREAS, due to limited availability in Judge Laporte's calendar and scheduling
 11 difficulties of the parties, the earliest available date to conduct a settlement conference before
 12 Judge Laporte is on July 13, 2005, and hence the parties have reserved that date for the
 13 settlement conference;

14 WHEREAS, the parties have already reached a settlement in principal, have engaged in
 15 discussions regarding the drafting of the settlement agreement, and believe that the settlement
 16 agreement will be documented and executed prior to the scheduled settlement conference of
 17 July 13, 2005;

18 WHEREAS, the anticipated settlement agreement will obviate the need for (1) IDNT's
 19 answer, (2) the case management conference statement, (3) the case management conference,
 20 and (4) the settlement conference;

21 WHEREAS, in view of the anticipated settlement agreement, the parties seek to
 22 continue (1) IDNT's deadline to file its answer to July 13, 2005, (2) the deadline for the parties
 23 to submit a case management conference statement to July 13, 2005, and (3) the timing of the
 24 case management conference to a time convenient to the Court after July 13, 2005; and

25 WHEREAS, the parties intend to immediately notify the Court once the settlement
 26 agreement is executed.

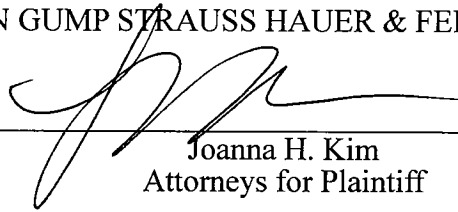
27 NOW THEREFORE, IT IS HEREBY STIPULATED by and between IDNT and
 28 VeriSign that (1) IDNT's deadline to file its answer is continued to July 13, 2005, (2) the

1 deadline for the parties to submit a case management conference statement is continued to July
2 13, 2005, and (3) the timing of the case management conference is continued to a time
3 convenient to the Court after July 13, 2005, on August 25, 2005.

4 Dated: June 2, 2005

AKIN GUMP STRAUSS HAUER & FELD LLP

5
6 By



Joanna H. Kim
Attorneys for Plaintiff

7 Dated: June 2, 2005

8
9 By

Neil Cohen
Attorneys for Defendant
IDN TECHNOLOGIES, LLC

10
11 IT IS SO ORDERED:

12 Dated: June 3, 2005



Honorable Phyllis J. Hamilton
United States District Court Judge

1 deadline for the parties to submit a case management conference statement is continued to July
2 13, 2005, and (3) the timing of the case management conference is continued to a time
3 convenient to the Court after July 13, 2005, on _____, 2005.

4 Dated: June 2, 2005

AKIN GUMP STRAUSS HAUER & FELD LLP

6 By _____

Joanna H. Kim
Attorneys for Plaintiff

7 Dated: June 2, 2005

9 By _____

Neil Cohen
Attorney for Defendant
IDN TECHNOLOGIES, LLC

11 IT IS SO ORDERED:

12 Dated: June __, 2005

14 _____
Honorable Phyllis J. Hamilton
United States District Court Judge

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